

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
SCOTTSDALE INSURANCE COMPANY

Plaintiff,

-against-

BO STEEL GROUP, INC., KSK CONSTRUCTION
GROUP, SEVENBERRY CONSTRUCTION LLC,
31-02 NORTHERN BLVD LLC, 30-36 NORTHERN
BLVD LLC, and ENEFRY ADONIS HIERRO,

Defendants.
-----X

BO STEEL GROUP, INC.,

Third-Party Plaintiff,

-against-

GARY G. EMANUEL BROKERAGE, INC.

Third-Party Defendant.
-----X

CIVIL ACTION NUMBER
14-cv-07318-KAM-VMS

**RESPONSES TO
INTERROGATORIES**

Defendant and third-party plaintiff Bo Steel Group, Inc. and non-party Bo Zhao Chen (collectively, "Bo Steel"), by its attorneys, King & King LLP, responds to the interrogatories dated July 8, 2016 propounded by third-party defendant Gary G. Emanuel Brokerage, Inc. ("Emanuel"), as follows:

OBJECTIONS

Bo Steel objects to the stated definitions and instructions to the extent that they purport to impose obligations beyond that required by the Federal Rules of Civil Procedure ("FRCP") and common practice and word usage, so as not to impose an unfair burden. Without waiving this objection, Bo Steel responds to the Emanuel set of interrogatories as provided herein.

Bo Steel objects to the interrogatories on grounds that they call for privileged communication between counsel and client and seek to divulge attorney and client work product

in connection with pending and likely litigation. Without waiving this objection, Bo Steel responds to the interrogatories as provided herein.

Bo Steel objects to the interrogatories on grounds that they call for information that may be solely in the control or possession of parties over which Bo Steel does not have any control, and does not have that parties' information and documents to refer to in response to any of the interrogatories that call for such information. Without waiving this objection, Bo Steel responds to the interrogatories as provided herein, and also reserves the right to amend these interrogatories prior to trial and/or upon completion of disclosure in this case.

RESPONSES TO INTERROGATORIES

Response to Interrogatory No. 1

Yes.

Response to Interrogatory No. 2

Yes.

Response to Interrogatory No. 3.

Yes.

Response to Interrogatory No. 4.

No, but was authorized to execute contracts on Bo Steel's behalf with label of president.

Response to Interrogatory No. 5.

No, but was authorized to execute contracts on Bo Steel's behalf with label of president.

Response to Interrogatory No. 6.

No, but was authorized to execute contracts on Bo Steel's behalf with label of president.

Response to Interrogatory No. 7.

No, but was authorized as a manager to execute contracts on Bo Steel's behalf with label of president.

Response to Interrogatory No. 8.

No, but was authorized as a manager to execute contracts on Bo Steel's behalf with label of president.

Response to Interrogatory No. 9.

No.

Response to Interrogatory No. 10.

Yes.

Response to Interrogatory No. 11.

Yes.

Response to Interrogatory No. 12.

Yes.

Response to Interrogatory No. 13.

No.

Response to Interrogatory No. 14.

No.

Response to Interrogatory No. 15.

N/A.

Response to Interrogatory No. 16.

N/A.

Response to Interrogatory No. 17.

N/A.

Response to Interrogatory No. 18.

N/A.

Response to Interrogatory No. 19.

N/A.

Response to Interrogatory No. 20.

N/A.

Response to Interrogatory No. 21

N/A.

Response to Interrogatory No. 22

N/A.

Response to Interrogatory No. 23.

Don't recall.

Response to Interrogatory No. 24.

Don't recall.

Response to Interrogatory No. 25.

Don't recall.

Response to Interrogatory No. 26.

Don't recall.

Response to Interrogatory No. 27.

Don't recall.

Response to Interrogatory No. 28.

Don't recall.

Response to Interrogatory No. 29.

Don't recall.

Response to Interrogatory No. 30.

Don't recall.

Response to Interrogatory No. 31

Don't recall.

Response to Interrogatory No. 32

Don't recall.

Response to Interrogatory No. 33.

(A) Yes.

(B) No.

(C) No.

(D) No.

(E) Don't know.

(F) No.

(G) Don't know.

Response to Interrogatory No. 34.

(A) Yes.

(B) No.

(C) No.

(D) No.

(E) Don't know.

Response to Interrogatory No. 35.

(A) Yes.

(B) No.

(C) No.

(D) No.

(E) Don't know.

(F) No.

(G) Don't know.

Response to Interrogatory No. 36.

(A) Yes.

(B) No.

(C) No.

(D) No.

(E) Don't know.

(F) No.

(G) Don't know.

Response to Interrogatory No. 37.

(A) Yes.

(B) No.

(C) No.

(D) No.

(E) Don't know.

(F) No.

(G) Don't know.

Response to Interrogatory No. 38.

(A) Yes.

(B) No.

(C) No.

(D) No.

(E) Don't know.

(F) No.

(G) Don't know.

Response to Interrogatory No. 39.

(A) No.

(B) No.

(C) No.

(D) No.

(E) Don't know.

(F) No.

(G) Don't know.

Response to Interrogatory No. 40.

(A)(i) Yes.

(A) (ii) Yes.

(A) (iii) Yes.

(B) No.

(C) No.

Dated: Pelham, New York
March 14, 2017

KING & KING, LLP

By: Peter M. Kutil

Peter M. Kutil, Esq.
*Attorneys for Bo Steel, KSK Construction Group
and Sevenberry*
Sanborn Map Building
629 Fifth Avenue
Pelham, New York 10803
(914) 380-5970

TO: Sharon Angelino, Esq.
Goldberg Segalla LLP
665 Main Street, Suite 400
Buffalo, N.Y. 14203

Joe Babchik, Esq.
Babchik & Young, LLP
245 Main Street
White Plains, N.Y. 10601

Angela A. Lainhart, Esq.
Nicoletti Gonson Spinner LLP
555 Fifth Avenue, 8th Flr.
New York, N.Y. 10017

Glenn Verchick, Esq.
Ginarte, O'Dwyer, Gonzalez, Gallardo & Winograd, L.L.P.
225 Broadway, 13th Floor
New York, N.Y. 10007

CERTIFICATION

I have read the foregoing interrogatories and interrogatory responses or such interrogatories and interrogatory responses have been read to me and I certify the foregoing statements made by me in the responses to the interrogatories are true. I am aware that if any of the foregoing statements made by me a willfully false, I am subject to punishment.

Dated: ~~March~~ April 1, 2017

Bo Zhao Chen
Bo Zhao Chen